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## VIA TELECOPY AND REGULAR MAIL

United States Environmental Protection Agency  
230 South Dearborn Street  
Mail Code 5CS-TUB-7  
Chicago, Illinois 60604  
Attention: Terry P. Branigan

RE: Arrowhead Refinery Site

Dear Mr. Branigan:

On behalf of our client, Sears, Roebuck & Co., please allow this letter to serve as Sears endorsement of the good faith offer submitted on August 15, 1990 by the Minnesota Arrowhead Site Committee (MASC) in response to the USEPA's "special notice letter." While Sears is not a signatory to MASC's Group Participation Agreement because of the Agreement's inequitable funding provisions, it has offered to participate with MASC on the basis of the ranking allegedly attributable to Sears in the USEPA's "PRPBASE Transaction Reports" dated July 25, 1989.

Similarly, this letter should be construed by the USEPA as evidence of Sears' willingness to participate at a de minimis level in the financing of a cost-effective and environmentally sound remedial action consistent with Sears' PRPBASE ranking (189th out of 273 PRP's with allegedly 100 gallons). Sears' willingness to participate at a de minimis funding level, however, should not be construed as an admission of liability as Sears denies any and all liability in connection with the Arrowhead Superfund site.

Finally, please notify the undersigned regarding any future negotiations between the PRPs, the Minnesota Pollution Control Agency (MPCA) and the USEPA.

Very truly yours,

JOHNSON & BELL, LTD.

Frederick S. Mueller

FSM/cc  
CC:

Cathy O'Connell/MPCA